



GLOBAL . EQUAL . ETHICAL

CONFLICTS OF  
INTEREST POLICY



## CONFLICTS OF INTEREST POLICY

### 1. INTRODUCTION

1.1. FXLinked LTD operating under the trading name FXLinked is a Securities Service Provider Licensee regulated and authorised by the Financial Services Authority (“FSA”) in Seychelles under the License Number: SD011 (hereinafter called the “Company”).

1.2. The Company takes all reasonable steps to detect and avoid conflicts of interest. The Company is committed to acting honestly, fairly and professionally and in the best interests of its clients and to complying, in particular, with the principles set out in the above regulations when providing financial services and other ancillary services related to such services.

### 2. PURPOSE AND SCOPE

2.1. The purpose of this document is to set out the Company’s approach to identify and manage conflicts of interest which may arise during the course of its business activities. If the Company has a material interest in a transaction to be entered with or for a client, or a relationship which gives rise to a conflict of interest in relation to the transaction, the Company shall not knowingly either advise, or deal in the exercise of discretion, in relation to that transaction unless the Company has:

2.2. The aim of our Policy is to identify and prevent conflicts of interest which may arise between the Company and its clients or between one client and another. Accordingly, we have adopted a conflicts of interest policy setting out the procedures, practices and controls in place to achieve this.

2.3. The Policy applies to all the Company’s directors, employees, any persons directly or indirectly linked to the Company (hereinafter called “related persons”) and refers to all interactions with all clients.

### 3. IDENTIFICATION OF CONFLICT OF INTERESTS

3.1. For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interests of a client, the Company takes into account, whether the Company or a relevant person, is in any of the following situations:

3.1.1. The Company or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;

3.1.2. The Company or relevant person has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;

3.1.3. The Company or relevant person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;

3.1.4. The Company or relevant person carries out the same business as the client;

3.1.5. The Company or relevant person receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.



#### 4. PROCEDURES AND CONTROLS TO MANAGING CONFLICTS OF INTERESTS

4.1. The procedures and controls that the Company follows to manage the identified conflicts of interest include, but are not limited to, the following measures:

4.1.1. Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving a risk of a conflict of interest where the exchange of that information may harm the interests of one or more clients;

4.1.2. Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services. Such measures include, but are not limited to, the following:

- a. A 'need to know' policy governing the dissemination of confidential or inside information within the Group.
- b. Chinese walls restricting the flow of confidential and inside information within our company, and physical separation of departments.
- c. Procedures governing access to electronic data.
- d. Segregation of duties that may give rise to conflicts of interest if carried on by the same individual.
- e. A gifts and inducements log registering the solicitation, offer or receipt of certain benefits.
- f. The prohibition of external business interests conflicting with our interests as far as the Company's officers and employees are concerned, unless board approval is provided.
- g. A policy designed to limit the conflict of interest arising from the giving and receiving of inducements.
- h. Monitoring and reporting on the above to the Company's Board of Directors by the Compliance Department.

4.1.3. The Compliance Department shall be responsible for identifying and managing potential conflicts of interests. The latter will also update the relevant internal procedures and ensure compliance with such procedures.

#### 5. DISCLOSURE

5.1. Where a conflict arises and the Company is aware of it, it will disclose the conflict to the client prior to undertaking investment business for that client or, if it does not believe that disclosure is appropriate to manage the conflict, we may choose not to proceed with the transaction or matter giving rise to the conflict.

5.2. The Company reserves the right to review and/or amend its Policy and arrangements, at its sole discretion, whenever it deems fit or appropriate.

5.3. Our Conflicts of Interest Policy is a policy only, it is not part of our Terms and Conditions of Business and is not intended to be contractually binding or impose or seek to impose any obligations on us which we would not otherwise have, but for the Act and Applicable Regulations.